

MEMO ENDORSED

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January 13, 2021

Hon. Valerie E. Caproni
United State District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Salifou Conde
19 Cr. 808 (VEC)

Hon. Valerie E. Caproni:

I am counsel for Salifou Conde, who respectfully requests temporary modification of the conditions of pretrial release to permit travel in Guinea, West Africa. His proposed dates of travel are to leave on January 30, 2021, and return on February 20, 2021. The purpose of the trip is to visit his mother, who resides in Guinea. I provided the address at which Mr. Conde proposes to stay to the United States Attorney's Office and to Pretrial Services.

This Court permitted temporary modification of Mr. Conde's travel restrictions on one prior occasion. Between March 7, 2020 and March 17, 2020, Mr. Conde was permitted to travel to Guinea, West Africa, to visit his dying father. (Dkt. 70, p. 4-8). During oral argument on that application, the Court noted that Mr. Conde is released on a \$100,000 personal recognizance bond signed by three family members, including his wife who lives with him in the United States. Mr. Conde is a United States citizen, and he also has a passport for Guinea. For that trip, Mr. Conde was required to surrender to Pretrial Services the United States passports of his two children, as a precondition to the Government releasing his passport to him. Within 48 hours of his return, Mr. Conde was required to surrender his passport to Pretrial Services. Mr. Conde proved that he was trustworthy to return to court by fully complying with the Court's order during that trip.

Assistant United States Attorney Kedar Bhatia informs me that he objects to this application. United States Pretrial Services Officer Kristen McKeown, who supervises Mr. Conde in the District of New Jersey, informs me that she has no objection.

Sincerely,

/s/

Donald J. Yannella, Esq.

c. AUSA Kedar Bhatia
Pretrial Services Officer Kristen McKeown

Application DENIED.

SO ORDERED.



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

1/13/2021